

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

**NATALIE REESER,**

Plaintiff,

v

Case No. 2:14-cv-11916-GCS-MJH  
Hon. George Caram Steeh  
Magistrate Judge Mona K. Majzoub

**HENRY FORD HEALTH SYSTEM  
d/b/a HENRY FORD HOSPITAL,**

Defendant.

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**PROPOSED VERDICT FORM**

We, the jury, answer the questions submitted as follows:

**Section 1 – Whistleblower Protection Act**

1. Did Plaintiff engage in protected activity under the Michigan Whistleblowers' Protection Act by reporting a violation of the Fair Labor Standards Act to a public body?

Yes \_\_\_\_\_ No \_\_\_\_\_

2. Did Plaintiff engage in protected activity under the Michigan Whistleblowers' Protection Act by being about to report a violation of the Fair Labor Standards Act to a public body?

Yes \_\_\_\_\_ No \_\_\_\_\_

*If your answer is “no” to Question 1 and 2, go on to Section 3. If your answer is “yes” to either Question 1 or Question 2, go on to Question No. 3.*

3. Did Defendants discharge Plaintiff?

Yes \_\_\_\_\_ No \_\_\_\_\_

*If your answer is “no,” go on to Section 3. If your answer is “yes,” go on to Question No. 3.*

4. Was plaintiff’s protected activity one of the motives or reasons for her discharge?

Yes \_\_\_\_\_ No \_\_\_\_\_

*If your answer is “no,” go on to Section 3. If your answer is “yes,” go on to Section 2.*

## **Section 2 – Whistleblower Protection Act Damages.**

Only answer the following questions if you answered “yes” to question 4 in Section 1.

5. What is the total amount of plaintiff’s damages to the present date for lost wages, and fringe benefits?

**Answer:** \$\_\_\_\_\_.

6. What is the total amount of plaintiff’s damages to the present date for noneconomic damages such as pain and suffering, extreme mental and emotional distress, humiliation, outrage, harm to reputation?

**Answer:** \$\_\_\_\_\_.

7. If you find that the plaintiff will sustain damages in the future for lost wages and fringe benefits or earnings or lost earning capacity or lost employment opportunity, give the total amount for each year in which the plaintiff will sustain damages.

**Answer:**

\$\_\_\_\_\_ . \_\_\_\_ 2016

\$\_\_\_\_\_ . \_\_\_\_ 2017

\$\_\_\_\_\_ . \_\_\_\_ 2018

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\$\_\_\_\_\_ . \_\_\_\_ 2040

\$\_\_\_\_\_ . \_\_\_\_ 2041

\$\_\_\_\_\_ . \_\_\_\_ 2042

\$\_\_\_\_\_ . \_\_\_\_ 2043

\$\_\_\_\_\_ . \_\_\_\_ 2044

\$\_\_\_\_\_ . \_\_\_\_ 2045 (retirement age)

Total: \$\_\_\_\_\_ . \_\_\_\_

8. If you find that the plaintiff will sustain noneconomic damages in the future such as pain and suffering, extreme mental and emotional distress, humiliation, outrage, harm to reputation, give the total amount for each year in which the plaintiff will sustain damages.

**Answer:**

\$\_\_\_\_\_ . \_\_\_\_ 2016

\$\_\_\_\_\_ . \_\_\_\_ 2017

\$\_\_\_\_\_ . \_\_\_\_ 2018

\$\_\_\_\_\_ . \_\_\_\_ 2019

\$\_\_\_\_\_ . \_\_\_\_ 2020

\$\_\_\_\_\_ . \_\_\_\_ 2021

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\$\_\_\_\_\_ .\_\_\_\_ 2039

\$\_\_\_\_\_ .\_\_\_\_ 2040

\$\_\_\_\_\_ .\_\_\_\_ 2041

\$\_\_\_\_\_ .\_\_\_\_ 2042

\$\_\_\_\_\_ .\_\_\_\_ 2043

\$\_\_\_\_\_ .\_\_\_\_ 2044

\$\_\_\_\_\_ .\_\_\_\_ 2045 (retirement age)

Total: \$\_\_\_\_\_ .\_\_\_\_

9. How much in exemplary damages is plaintiff entitled to under the Whistleblower Protection Act only?

Answer: \_\_\_\_\_

TOTAL OF ALL DAMAGES IN SECTION 2: \$\_\_\_\_\_.\_\_\_\_

### **Section 3 – Fair Labor Standards Act**

10. Did Plaintiff engage in protected activity under the Fair Labor Standards Act by asserting her rights under Fair Labor Standards Act to wages for unpaid work she performed during her lunch?

Yes \_\_\_\_ No \_\_\_\_

*If your answer is “no” to Question 10, do not answer any further questions. If your answer is “yes” to Question , go on to Question No. 11.*

11. Did Defendants discharge Plaintiff?

Yes \_\_\_\_ No \_\_\_\_

*If your answer is “no,” do not answer any further questions. If your answer is “yes,” go on to Question No. 12.*

12. Was plaintiff’s protected activity the reason for her discharge?

Yes \_\_\_\_ No \_\_\_\_

*If your answer is “no,” do not answer any further questions. If your answer is “yes,” go on to Section 4.*

### **Section 4 – Fair Labor Standards Act Damages.**

Only answer the following questions if you answered “yes” to question 3 in Section 3.

13. What is the total amount of plaintiff's damages to the present date for lost wages, and fringe benefits? [NOTE: IF YOU HAVE AWARDED PAST-ECONOMIC DAMAGES IN QUESTION NO. 5, DO NOT ANSWER THIS QUESTION]

Answer: \$\_\_\_\_\_.

14. What is the total amount of plaintiff's damages to the present date for noneconomic damages such as pain and suffering, extreme mental and emotional distress, humiliation, outrage, harm to reputation? [NOTE: IF YOU HAVE AWARDED PAST-NON-ECONOMIC DAMAGES IN QUESTION NO. 6, DO NOT ANSWER THIS QUESTION]

Answer: \$\_\_\_\_\_.

15. If you find that the plaintiff will sustain damages in the future for lost wages and fringe benefits or earnings or lost earning capacity or lost employment opportunity, give the total amount for each year in which the plaintiff will sustain damages. [NOTE: IF YOU HAVE AWARDED PAST-ECONOMIC DAMAGES IN QUESTION NO. 7, DO NOT ANSWER THIS QUESTION]

Answer:

\$\_\_\_\_\_.\_\_\_\_ 2016

\$\_\_\_\_\_.\_\_\_\_ 2017

\$\_\_\_\_\_.\_\_\_\_ 2018

\$\_\_\_\_\_.\_\_\_\_ 2019

\$\_\_\_\_\_.\_\_\_\_ 2020

\$\_\_\_\_\_.\_\_\_\_ 2021

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\$\_\_\_\_\_ . \_\_\_\_ 2043

\$\_\_\_\_\_ . \_\_\_\_ 2044

\$\_\_\_\_\_ . \_\_\_\_ 2045 (retirement age)

Total: \$\_\_\_\_\_ . \_\_\_\_

16. If you find that the plaintiff will sustain noneconomic damages in the future such as pain and suffering, extreme mental and emotional distress, humiliation, outrage, harm to reputation, give the total amount for each year in which the plaintiff will sustain damages. [NOTE: IF YOU HAVE AWARDED PAST-NON-ECONOMIC DAMAGES IN QUESTION NO. 8, DO NOT ANSWER THIS QUESTION]

**Answer:**

\$\_\_\_\_\_ . \_\_\_\_ 2016

\$\_\_\_\_\_ . \_\_\_\_ 2017

\$\_\_\_\_\_ . \_\_\_\_ 2018

\$\_\_\_\_\_ . \_\_\_\_ 2019

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\$\_\_\_\_\_ . \_\_\_\_ 2043

\$\_\_\_\_\_ . \_\_\_\_ 2044

\$\_\_\_\_\_ . \_\_\_\_ 2045 (retirement age)

Total: \$\_\_\_\_\_ . \_\_\_\_

17. How much in punitive damages is plaintiff entitled to under the Fair Labor Standards Act only?

Answer: \_\_\_\_\_

TOTAL OF ALL DAMAGES IN SECTION 4: \$\_\_\_\_\_ . \_\_\_\_

18. Was defendant's violation of the Fair Labor Standards Act willful?

Yes \_\_\_\_ No \_\_\_\_

Signed,

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Foreperson

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Date